

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

Angela DeSantiago,

Plaintiff

vs.

Case No. 1:12-cv-01306-RHS-WDS

Loan Today 2, Inc.,

Defendant.

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

Plaintiff Angela DeSantiago ("Plaintiff"), hereby moves for default judgment against Defendant Loan Today 2, Inc. ("Defendant"), who was served with Plaintiff's Complaint via personal service on March 29, 2013. *See* Affidavit of Service attached hereto as Exhibit A. Defendant has offered no explanation for its failure to answer the instant complaint. Accordingly, Plaintiff seeks default judgment against Defendant in the amount of four thousand four hundred and sixteen dollars and seventy two cents (\$4,416.72), representing statutory damages in the amount of one thousand dollars (\$1,468.40), 15 U.S.C. §1640(a)(2)(A), two thousand four hundred eighty-five dollars and fifty cents (\$2,485.50) in attorney fees and four hundred sixty-two dollars and eighty-two cents (\$462.82) for court costs.

This sum is supported by the Declaration of undersigned, attached hereto as Exhibit B.

Respectfully Submitted,

s/Anita M. Kelley  
Anita M. Kelley

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Not admitted before this Court  
ECF@AttorneysForConsumers.com

**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2013, a true and correct copy of Plaintiff's Motion for Default Judgment was filed electronically with the Clerk of the U.S. District Court of New Mexico. Copy of the foregoing was sent to Defendant via U.S. mail as follows:

Loan Today 2, Inc.  
8019 Menaul Blvd. NE, #C  
Albuquerque, NM 87110

s/Anita M. Kelley  
Anita M. Kelley